Section 1274 -- Determination of Issue Price in the Case of Certain Debt Instruments Issued for Property

(Also Sections 42 280G 382 467 468 482 483 1288 7520 7872)

Rev. Rul. 2020-20

This revenue ruling provides various prescribed rates for federal income tax purposes for October 2020 (the current month). Table 1 contains the short-term, midterm, and long-term applicable federal rates (AFR) for the current month for purposes of section 1274(d) of the Internal Revenue Code. Table 2 contains the short-term, midterm, and long-term adjusted applicable federal rates (adjusted AFR) for the current month for purposes of section 1288(b). Table 3 sets forth the adjusted federal long-term rate and the long-term tax-exempt rate described in section 382(f). Table 4 contains the appropriate percentages for determining the low-income housing credit described in section 42(b)(1) for buildings placed in service during the current month. However, under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%. Finally, Table 5 contains the federal rate for determining the present value of an annuity, an interest for life or for a term of years, or a remainder or a reversionary interest for purposes of section 7520

REV. RUL. 2020-20 TABLE 1

Applicable Federal Rates (AFR) for October 2020

	Period for Compounding					
	<u>Annual</u>	Semiannual	Quarterly	Monthly		
	Short-term					
AFR	0.14%	0.14%	0.14%	0.14%		
110% AFR	0.15%	0.15%	0.15%	0.15%		
120% AFR	0.17%	0.17%	0.17%	0.17%		
130% AFR	0.18%	0.18%	0.18%	0.18%		
	<u>Mid-term</u>					
۸۵۵	0.200/	0.200/	0.200/	0.200/		
AFR	0.38%	0.38%	0.38%	0.38%		
110% AFR	0.42%	0.42%	0.42%	0.42%		
120% AFR	0.46%	0.46%	0.46%	0.46%		
130% AFR	0.49%	0.49%	0.49%	0.49%		
150% AFR	0.57%	0.57%	0.57%	0.57%		
175% AFR	0.67%	0.67%	0.67%	0.67%		
	<u>Long-term</u>					
AFR	1.12%	1.12%	1.12%	1.12%		
110% AFR	1.23%	1.23%	1.23%	1.23%		
120% AFR	1.23%	1.34%	1.34%	1.34%		
130% AFR	1.47%	1.46%	1.46%	1.46%		
130% AFK	1.4170	1.40%	1.40%	1.40%		

REV. RUL. 2020-20 TABLE 2

Adjusted AFR for October 2020

	Annual	eriod for Compo Semiannual	Quarterly	<u>Monthly</u>
Short-term adjusted AFR	0.11%	0.11%	0.11%	0.11%
Mid-term adjusted AFR	0.29%	0.29%	0.29%	0.29%
Long-term adjusted AFR	0.85%	0.85%	0.85%	0.85%

REV. RUL. 2020-20 TABLE 3

Rates Under Section 382 for October 2020

Adjusted federal long-term rate for the current month

.85%

Long-term tax-exempt rate for ownership changes during the current month (the highest of the adjusted federal long-term rates for the current month and the prior two months.)

.85%

REV. RUL. 2020-20 TABLE 4

Appropriate Percentages Under Section 42(b)(1) for October 2020 Note: Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

Appropriate percentage for the 70% present value low-income housing credit	7.17%
Appropriate percentage for the 30% present value low-income housing credit	3.07%

REV. RUL. 2020-20 TABLE 5

Rate Under Section 7520 for October 2020

Applicable federal rate for determining the present value of an annuity, an interest for life or a term of years, or a remainder or reversionary interest

.4%